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Additional Counsel on Signature Page

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

IN RE NIKE, INC. SECURITIES
LITIGATION

Case No. 3:24-cv-00974-AN

**STIPULATION AND ORDER SETTING
DEADLINE TO FILE THE AMENDED
COMPLAINT AND MOTION TO
DISMISS BRIEFING SCHEDULE**

Judge: Hon. Adrienne Nelson

**STIPULATION AND ORDER SETTING DEADLINE TO FILE THE AMENDED
COMPLAINT AND MOTION TO DISMISS BRIEFING SCHEDULE**

Lead Plaintiff Caisse de dépôt et placement du Québec and Deka Investment GmbH (collectively, “Lead Plaintiff”), and Defendants Nike, Inc., John J. Donahoe II, and Matthew Friend (collectively, “Defendants,” and together with Lead Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate that good cause exists to request an order from the Court setting forth the schedule for the filing of Lead Plaintiff’s consolidated amended complaint and Defendants’ anticipated motion to dismiss, as defined below.

WHEREAS, shareholders of Nike, Inc. filed two securities class actions against Defendants alleging violations of Section 10(b) and 20(a) of the Securities Exchange Act of 1934, 15 U.S.C. §§ 78j(b), and 78t(a), and SEC Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5, which are captioned as *City Pension Fund for Firefighters and Police Officers in the City of Pembroke Pines v. Nike, Inc., et al.*, 3:24-cv-00974-AN (D. Or.) and *Mehta v. Nike, Inc., et al.*, No. 3:24-cv-01150-AN (D. Or.).

WHEREAS, Defendants have been served the initial complaints and summonses in these two actions, *see Pembroke*, 3:24-cv-00974, ECF Nos. 5-7; *Mehta*, 3:24-cv-01150, ECF Nos. 4-6.

WHEREAS, pursuant to a Stipulation and Order filed with this Court on August 8, 2024 (ECF No. 11), the Court consolidated these two actions under the caption of *In re Nike, Inc. Securities Litigation*, No. 3:24-cv-00974-AN (D. Or.) (“Consolidated Action”), and further ordered that, within fourteen (14) days after the entry of an order appointing Lead Plaintiff and Lead Counsel, the Lead Plaintiff and Defendants must submit a proposed schedule for the filing of a consolidated amended complaint and Defendants’ response thereto. *See* ECF No. 11 at 4-5.

WHEREAS, on October 25, 2024, the Court appointed Caisse de dépôt et placement du Québec and Deka Investment GmbH as Lead Plaintiff and Labaton Keller Sucharow LLP as Lead Counsel, with Stoll Stoll Berne Lokting & Shlachter P.C. serving as liaison counsel. *See* ECF No. 42.

WHEREAS, the Parties have conferred and jointly submit the following stipulation and proposed order.

IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for the Parties, subject to Court approval, that:

1. Lead Plaintiff shall have ninety (90) days from the date that this Stipulation and Proposed Order is entered by the Court to file a consolidated amended complaint;
2. Defendants shall answer, move against, or otherwise respond to the consolidated amended complaint, which shall be the operative complaint in the Consolidated Action, within ninety (90) days after the Lead Plaintiff files a consolidated amended complaint;
3. Lead Plaintiff shall have ninety (90) days to oppose any motion(s) Defendants may file to dismiss the amended consolidated complaint; and
4. Defendants' replies shall be due forty-five (45) days after the filing of Lead Plaintiff's opposition papers.

DATED: November 8, 2024

Respectfully submitted,

/s/ Irina Vasilchenko
Irina Vasilchenko

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*Liaison Counsel for Lead Plaintiff and the
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DATED: November 8, 2024

Respectfully submitted,

/s/ B. John Casey

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*Attorneys for Defendants Nike, Inc., John J.
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PURSUANT TO STIPULATION, IT IS ORDERED.



DATED: November 12, 2024.

Hon. Adrienne Nelson